

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 14-66(2)(RHK/JSM)

UNITED STATES OF AMERICA,)
)
Plaintiff,) MOTION TO RELEASE
)
vs.) DEFENDANT FROM
)
APRIL FAY LEWIS,)
)
Defendant.)

The Defendant, April Fay Lewis, through her attorney, Michael W. McDonald, moves the Court for an order releasing her from the halfway house and allowing her to reside with her son and son's father. The reasons for this request include but are not limited to:

1. She has successfully completed outpatient treatment for chemical dependency;
2. She has a job waiting for her at the Super 8 Motel;
3. Her young son, six years old, would benefit from her presence in the home;
4. Her son's father, Shane Sveum, thinks April's presence in his home is a "great idea" and fully supports the move;
5. Her chemical dependency sponsor and many supporting friends can provide a network of support for her;
6. She has a "home group" in place for support;
7. Her "therapist" is available to her; and
8. She has passed all her drug tests.

This motion is based upon all of the files and records herein.

Dated: July 9, 2014

Respectfully submitted,

s/Michael W. McDonald
Michael W. McDonald, #70099
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